

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

WASSIM MAZLOUM,

Defendant.

* Case No. 3:06CR719
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* Chief Judge James G. Carr
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**DEFENDANT WASSIM MAZLOUM'S MOTION FOR MODIFICATION OF
CONDITIONS OF PRE-TRIAL RELEASE**

Defendant Wassim Mazloun, by and through his counsel, moves this Court for an order modifying the conditions of his pre-trial release to allow Mr. Mazloun to attend religious services. A brief memorandum in support of this request follows.

Respectfully submitted,

JEFFREY J. HELMICK
DAVID L. DOUGHTEN
MOHAMMAD ABDRAHBOH

By /s/ Jeffrey J. Helmick
JEFFREY J. HELMICK (0040197)

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COUNSEL FOR DEFENDANT
WASSIM MAZLOUM

CERTIFICATION

This motion will be served on all counsel of record by operation of the court's electronic filing system.

/s/ Jeffrey J. Helmick

MEMORANDUM

Defendant Wassim Mazloun was charged by an indictment filed February 16, 2006. He was detained continuously until this Court granted him pretrial release on August 31, 2007. Mr. Mazloun's release includes a number of safeguards, including electronic monitoring, supervision by court-approved custodians and significant restrictions on movement. Currently, Mr. Mazloun is only allowed to leave his family home for medical purposes, court appearances and conferences with his counsel. Since his release, Mr. Mazloun has adjusted well to his return to his home.

In deciding to release Mr. Mazloun, this Court specifically mentioned addresses attendance at religious services at a later time. A devout Muslim, Mr. Mazloun now proposes that he be permitted to attend services at Masjid Saad Foundation, a mosque

located at 5225 West Alexis Road, in the City of Sylvania, Ohio. This mosque is only four-tenths of a mile from Mr. Mazloun's current residence.

Mr. Mazloun asks that he be allowed to attend services at MSF mosque every Friday afternoon. In addition, the Court is undoubtedly aware that the month-long Muslim observance of Ramadan is ongoing, the most venerated and blessed month of the Islamic year. Ordinarily, a devout Muslim would attend services five times per day, every day of the holy month, which ends on October 12 this year. If this is not acceptable to the Court, Mr. Mazloun suggests as a compromise that he be allowed to attend services two additional days per week, plus Friday, through the end of Ramadan. Afterward, he would resume attendance once per week, on Friday afternoons.

Wherefore, Mr. Mazloun respectfully requests this Court to amend the terms and conditions of his pretrial release to allow him to attend services regularly at the Masjid Saad Foundation mosque.

Respectfully submitted,

JEFFREY J. HELMICK
DAVID L. DOUGHTEN
MOHAMMAD ABDRAHBOH

By /s/ Jeffrey J. Helmick
JEFFREY J. HELMICK (0040197)

Counsel for Wassim Mazloun